

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

AMICUS MIAMI OF OHIO, LLC  
78 Grand Street, Unit 4  
New York, NY 10013,

Plaintiff,

v.

Case No.

HEATHER HOELZER KACACHOS  
3401 Lanes Mill Road  
Oxford, OH 45056,

and

THOMAS KACACHOS  
3401 Lanes Mill Road  
Oxford, OH 45056

Defendants.

**[PROPOSED] ORDER GRANTING AMICUS MIAMI OF OHIO, LLC’S  
MOTION FOR A TEMPORARY RESTRAINING ORDER**

Before the Court is Plaintiff Amicus Miami of Ohio, LLC’s motion for a Temporary Restraining Order and Preliminary Injunction, pursuant to Rule 65(a)-(b) of the Federal Rules of Civil Procedure, seeking to enjoin Defendants Heather Hoelzer Kacachos (“Ms. Kacachos”) and Thomas Kacachos (“Mr. Kacachos” and, collectively, “Defendants”) from selling the Properties that are the subject of the Parties Limited Liability Company Membership Interests Purchase and Sale Agreement (“PSA”) during the pendency of this litigation.

This Court has considered the Verified Complaint, Motion for Temporary Restraining Order and Preliminary Injunction, and the Memorandum in Support of the Motion and finds that:

1. Amicus has shown a strong likelihood of success on the merits;

2. Amicus has shown it will suffer material and irreparable harm if the temporary restraining order is not granted;
3. The potential harm to Amicus if the temporary restraining order is not granted outweighs the potential harm to the Sellers if the order is issued;
4. The public interest would be served by issuing a temporary restraining order; and
5. Amicus has no adequate remedy at law.

For the reasons stated above, the Court finds that in order maintain the status quo pending disposition of Amicus's Motion for Preliminary Injunction, Amicus's Motion for Temporary Restraining Order should be and is hereby **GRANTED**.

It is, therefore, **ORDERED, ADJUDGED, AND DECREED** that:

- A. The Sellers shall be restrained and enjoined from (i) violating the terms of the PSA and (b) selling or otherwise transferring the properties, as established and described in the PSA.
- B. The Court also awards Amicus reasonable attorneys' fees.
- C. A preliminary injunction hearing is set in this matter for \_\_\_\_\_, 2022,  
at \_\_\_\_:\_\_\_\_ \_m.

IT IS SO ORDERED.

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Judge [INSERT NAME]